

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

HANS MENOS, derivatively on behalf of  
ECO SCIENCE SOLUTIONS, INC.,

Plaintiff,

v.

JEFFERY L. TAYLOR, DON L.  
TAYLOR, L. JOHN LEWIS, S.  
RANDALL OVESON, and GANNON  
GIGUIERE,

Defendants,

and

ECO SCIENCE SOLUTIONS, INC.,

Nominal Defendant.

Case No. 3:17-CV-00662-LRH-CBC

**STIPULATION AND  
ORDER TO EXTEND DEADLINE FOR  
PLAINTIFF'S RESPONSE TO MOTION  
TO DISMISS AND DEFENDANTS'  
REPLY THERETO**

**(First Request)**

1 Pursuant to LR IA 6-1, LR IA 6-2, and LR 7-1, Plaintiff Hans Menos, by and through his  
2 counsel the law firms of Leverty & Associates Law Chtd. Ltd. and The Rosen Law Firm, P.A. and  
3 Defendants Jeffery L. Taylor, Don L. Taylor, L. John Lewis, S. Randall Oveson and Gannon  
4 Giguere (collectively, "Individual Defendants") and Nominal Defendant Eco Science Solutions,  
5 Inc. ("Nominal Defendant" and with Individual Defendants, "Defendants"), by and through their  
6 counsel, the law firm of Greenberg Traurig, LLP, hereby stipulate and agree to extend the deadline  
7 for Plaintiff to respond to Defendants' Motion to Dismiss Verified Stockholder Derivative  
8 Complaint, filed on September 27, 2018 as Dkt. No. 42 (the "Motion to Dismiss"), by forty-five  
9 (45) days, through and including November 26, 2018, and request that the Court enter an order  
10 approving the same. Currently, Plaintiff's opposition to the Motion to Dismiss is due on October  
11 11, 2018.

12 Counsel for Plaintiff requests additional time due to several upcoming deadlines which  
13 would make it difficult to file an opposition timely. Defendants' counsel have agreed to the  
14 extension as a professional courtesy.

15 Counsel for Plaintiff and counsel for Defendants hereby further stipulate and agree that  
16 Defendants' reply to Plaintiff's response shall be due twenty-one (21) days thereafter, through and  
17 including December 17, 2018, and request that the Court enter an order approving the same.

18 This is the first stipulation for an extension of time for Plaintiff to respond to the Motion  
19 to Dismiss and for Defendants' reply thereto.

20 Dated: October 1, 2018

By: /s/Patrick R. Leverty  
Patrick R. Leverty  
LEVERTY & ASSOCIATES LAW CHTD.  
832 Willow Street  
Reno, NV 89502

Phillip Kim  
THE ROSEN LAW FIRM, P.A.  
275 Madison Avenue, 34<sup>th</sup> Floor  
New York, NY 10016

*Attorneys for Plaintiff*

1  
2 Dated: October 1, 2018

By: /s/Joel M. Eads


Mark E. Ferrario  
Christopher R. Miltenberger  
GREENBERG TRAURIG, LLP  
3773 Howard Hughes Parkway  
Suite 400 North  
Las Vegas, NV 89169

Joel M. Eads  
GREENBERG TRAURIG, LLP  
2700 Two Commerce Square  
2001 Market Street  
Philadelphia, PA 19103

10 *Attorneys for Defendants and Nominal*  
11 *Defendant*

13 **IT IS SO ORDERED:**

14 DATED this 3rd day of October, 2018.

15   
16  
17 LARRY R. HICKS  
18 UNITED STATES DISTRICT JUDGE